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REMARKS

This is in full and timely response to the Office Action mailed October 7, 2003 (Paper No. 15). Reexamination, reconsideration and allowance in light of the above amendments and the following remarks are respectfully requested.

By this Amendment, claims 21-23 were added, and include the limitation of routing calls in a call center. Support for new claims 21-22 can be found variously throughout the specification, for example, claims 1-3 and 14, and at paragraphs [0007] – [0011]. Support for new claim 23 can be found variously throughout the specification, for example, claim 16, at paragraphs [0048] – [0054] and Figs. 4-5.

Applicant's Representative thanks the Examiner for the courtesies extended during the December 16, 2003 personal interview.

Claims 1-18 and 20-23 are currently pending for the Examiner's reconsideration, with claims 1, 14, 16 and 21-23 being independent.

A.   **Interview Summary**

A personal Interview was conducted between Applicant's Representative Robert Green who worked with the undersigned on the response, SPE Tsang and Examiner Gauthier on December 16, 2003. It was agreed that the issue to be discussed was the definition of "maximum benefit router." The examiners explained their interpretation of the primary reference (Lim) and the secondary reference (Robinson). It was agreed on what Lim and Robinson do separately. To summarize, Lim answers a telephone call, then interacts with the caller using a menu system and voice recognition, then routes the call based on the caller election. Robinson receives the dialed number, then determines the least costly long distance carrier, then routes the call to the dialed number via the cheapest available carrier. Applicant's representative argued that Robinson is not answering the telephone call before it routes the call. The examiner's position was that they are taking the "maximum benefit" portion of Robinson and substituting it into the back half (routing portion) of Lim. Applicant's representative argued that both Lim and Robinson start after the call is made by a caller, therefore the examiners cannot place one before the other. The examiners stated that they are only using the routing portion of Robinson. SPE Tsang presented that as far as "answering the call" occurs in Lim, they are treating it as receiving the caller signal rather than an "off hook" situation at the front end, and therefore Robinson, which is not "off hook" when the signal is received, still routes the call based on a benefit (cost).

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It was agreed that the term "maximum benefit router" was well defined in the specification. The examiners indicated their concern that the claim language may be too broad because "it does not limit what the benefit is". Applicant's representative addresses this concern explicitly in the remarks below.

B.   Rejections under 35 U.S.C. §103

1.   Claims 1-3, 5-6, 8 and 14

Claims 1-3, 5-6, 8, 11 and 14 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,477,240 to Lim et al. in view of U.S. Patent No. 6,141,411 to Robinson et al. Applicant respectfully traverses this rejection.

Claim 1 recites an automated call routing system that routes a telephone call by responding to a routing objective of a calling party, comprising: a speech recognizer that determines at least one phrase from a speech utterance made by the calling party and outputs a digital phrase; a topic identifier that receives the digital phrase and converts the digital phrase to at least one of a word stem and a word class and generates a topic output; and a maximum benefit router that receives the topic output and determines where to route the telephone call in order to optimize at least one predetermined parameter, said telephone call routed based on maximum benefit.

Claim 14 recites an automated call routing system that routes a call by responding to a routing objective of a calling party, comprising: a recognizer that determines at least one phrase made by the calling party and outputs a second phrase; a topic identifier that receives the second phrase and converts the second phrase to at least one of a word stem and a word class and generates a topic output; and a maximum benefit router that receives the topic output and determines where to route the call in order to optimize at least one predetermined parameter, said telephone call routed based on maximum benefit.

Lim et al. '240 discloses a method for permitting a user to create a plurality of outbound communication paths to a plurality of communications devices from a unified messaging system. That is, Lim et al. '240 answers a telephone call, then interacts with the caller using a menu system and voice recognition, then routes the call based on the caller election. Lim et al. '240 does not disclose, teach or suggest a maximum benefit router, or a

maximum benefit router that receives the topic output and determines where to route the telephone call in order to optimize at least one predetermined parameter, said telephone call routed based on maximum benefit.

Robinson et al. '411 discloses a telephone call routing device that has the facility to route a telephone call based on the digits received. That is, Robinson et al. '411 receives the dialed number, then determines the least costly long distance carrier, then routes the call to the dialed number via the least expensive available carrier. Robinson et al. '411 does not answer the telephone call before it routes the call. Robinson et al. '411 is applied for allegedly being the claimed maximum benefit router.

However, Robinson et al. '411 does not disclose, teach or suggest the claimed maximum benefit router as claimed and disclosed in Applicant's specification. As agreed during the December 16, 2003 personal interview, the maximum benefit router is well defined in the specification. As the term maximum benefit router is well defined, it is clear that the attributes of the maximum benefit router are not disclosed, taught or suggested in Robinson et al. '411. For example, Robinson et al. '411 utilizes a look-up-table or other matrix to compare cost of long distance carriers based on the dialed telephone digits. See column 6, lines 22-26.

It is clear the Office Action has stretched the reference beyond its limitations.

As stated in Applicant's previous response, in contrast, claims 1 and 14 both require a maximum benefit router that receives the topic output and determines where to route the call in order to optimize at least one predetermined parameter, said telephone call routed based on maximum benefit. As disclosed in the specification, for example, at paragraph [0010], a maximum benefit router

> routes telephone calls based on the caller's goals and/or the benefit of routing
> callers to a customer care center most appropriate for retrieving a valid answer for
> the caller. In general, the cost or benefit is based on the fastest and least
> expensive way to answer a query posed by a caller. Using a probabilistic model
> of the caller's goals or call-topics based on a response to a top-level prompt, and a
> set of functions associating a utility or benefit with routing those call-topics to
> destinations within the center, the utility or benefit is measured according to a
> measurable criteria such as agent time saved. The invention selects the
> destination for each call that will have the maximum expected benefit. Stated
> simply, for example, when a caller has a question about billing, the call is best
> routed to a person who has special knowledge about billing, and most likely can
> answer the billing question in the shortest amount of time. If the billing question
> was routed to a person having special knowledge about, for example, installation,
> it most likely would take more time to answer a billing question, and the answer
> might not be as accurate. In this manner, questions about billing are routed to a

person best equipped to answer the question according to the measured criteria, thereby freeing up a specialist that can answer installation questions from another call inquiring about installation.

Accordingly, claims 1 and 14 clearly claim a maximum benefit router that routes telephone calls based on maximum benefit.

Still further, as disclosed in the specification, for example, at paragraphs [0035]-[0036],

The maximum benefit routing determination program 30 then calculates an output vector, $b = Bt$, which contains the expected benefits of routing the caller 12 to the destinations 32 given their utterance 16, such that

$$Benefit\langle d_i | Words\rangle = \varepsilon\langle benefit\langle d_i | t\rangle | Words\rangle = \sum_{j=1}^{N} benefit\langle d_i | t_j\rangle \Pr\langle t = t_j | Words\rangle.$$

The maximum benefit routing determination program 30 then chooses the destination that maximizes this sum, or $\arg\max_i (b_i)$, to make the most beneficial routing choice.

Applicant reminds the examiner that the term maximum benefit router is well defined in the specification, and that the meaning of the term is determined by the meaning given in the specification. See Markman v. Westview Instruments, Inc., 52 F.3d 967, 34 USPQ2d 1321 (Fed. Cir. 1995), aff'd, 517 U.S. 370, 116 S.Ct. 1384, 38 USPQ2d 1461 (1996); McGill, Inc. v. John Zink Co., 736 F.2d 666, 674 (Fed. Cir. 1984); ZMI Corp. v. Cardiac Resuscitator Corp., 884 F.2d 1576, 1580, 6 USPQ2d 1557, 1560-61 (Fed. Cir. 1988) ("words must be used in the same way in both the claims and the specification."). Accordingly, Applicant is not arguing elements that are not recited in the claims.

Accordingly, the maximum benefit router, and the routing of telephone calls based on maximum benefit, is not disclosed, taught or suggested by Robinson et al. '411.

Since Robinson et al. '411 does not disclose, teach or suggest the claimed maximum benefit router, Robinson et al. '411 does not make up for the acknowledged deficiencies of Lim et al. '240, and a prima facie case of obviousness has not been established by the examiner. Withdrawal of this rejection is respectfully requested.

Still further, the Office Action acknowledges that Lim et al. '240 does not disclose, teach or suggest the claimed maximum benefit router. The Examiner has attempted to attach the router of Robinson et al. '411 to the so-called back end of Lim et al. '240. In order to attach the router of Robinson et al. '411 to Lim et al. '240, the Office Action states that "It

would be obvious...to use the least cost router which analyses the digits to make the routing decisions of Robinson in the telephony of Lim." See Office Action at page 3, lines17-19. The Office Action continues by stating that the "modification of the invention will offer the capability of the least cost router which analyses the digits to make the routing decisions such as the system would reduce the time dialing a calling number for routing the call to the best carrier." See Office Action at page 3, lines 20-222. During the Personal Interview, the examiner alleged that Lim et al. '240 discloses a router that routes a call based on the caller election, and therefore, the router of Robinson et al. '411 can be substituted, allegedly resulting in a maximum benefit routing of the call. However, adding or substituting the router of Robinson et al. '411 does not take the desire of the caller, as determined by the caller's election of routing destination, and route the call to the caller' s desired destination. Rather, adding or substituting Robinson et al. '411 to the back end of Lim et al. '420 would route the call differently than the destination requested or desired by the caller. Accordingly, this does not justify adding the router of Robinson et al. '411 to the back end of Lim et al. '240 absent only what is known from the instant application, and the Examiner has not shown, and therefore not established a prima facie case of obviousness. Accordingly, in view of the discussion above, the conclusion by the examiner can only be made using improper hindsight.

It is established law that one "cannot use hindsight reconstruction to pick and chose among isolated disclosures in the prior art to deprecate the claimed invention." Ecolochem, Inc. v. Southern California Edison Company, page 23, September 7, 2000 (Fed. Cir.) (citing In re Fine, 837 F.2d 1071, 1075, 5, USPQ2d 1780, 1783 (Fed. Cir. 1988)). As this rejection is assembling the router of Robinson et al. '411 to the back end of Lim et al. '240, the examiner has defined "the problem in terms of its solution reveals improper hindsight in the selection of the prior art relevant to obviousness." Ecolochem at 24 (citing Monarch Knitting Mach. Corp. v. Sulzer Morat Gmbh, 139 F.3d 877, 880, 45 USPQ2d 1977, 1981 (Fed. Cir. 1998)).

For all of the reasons above, the Office Action has not established a prima facie case of obviousness, and the rejection of claims 1 and 14 should be withdrawn.

Regarding claim 2, the Office Action acknowledges that Lim et al. '240 fail to disclose a maximum benefit router. See Office Action at page 3, line 12. However, as discussed above, Robinson et al. '411 discloses also fails to disclose, teach or suggest the claimed maximum benefit router. Sill further, as discussed above, simply attaching the router of Robinson et

al.'411 to the back end of Lim et al. '240 is a result of improper hindsight and blueprinting, and accordingly a prima facie case of obviousness has not been established. Withdrawal of this rejection is respectfully requested.

Regarding claim 3, the Office Action acknowledges that Lim et al. '240 fail to disclose a maximum benefit router. See Office Action at page 3, line 12. However, as discussed above, Robinson et al. '411 discloses also fails to disclose, teach or suggest the claimed maximum benefit router. Sill further, as discussed above, simply attaching the router of Robinson et al.'411 to the back end of Lim et al. '240 is a result of improper hindsight and blueprinting, and accordingly a prima facie case of obviousness has not been established. Withdrawal of this rejection is respectfully requested.

Regarding claim 5, the Office Action acknowledges that Lim et al. '240 fails to disclose a maximum benefit router. See Office Action at page 3, line 12. However, as discussed above, Robinson et al. '411 also fails to disclose, teach or suggest the claimed maximum benefit router. Sill further, as discussed above, simply attaching the router of Robinson et al.'411 to the back end of Lim et al. '240 is a result of improper hindsight and blueprinting, and accordingly a prima facie case of obviousness has not been established. Withdrawal of this rejection is respectfully requested.

Regarding claim 6, the Office Action acknowledges that Lim et al. '240 fails to disclose a maximum benefit router. See Office Action at page 3, line 12. However, as discussed above, Robinson et al. '411 also fails to disclose, teach or suggest the claimed maximum benefit router. Sill further, as discussed above, simply attaching the router of Robinson et al.'411 to the back end of Lim et al. '240 is a result of improper hindsight and blueprinting, and accordingly a prima facie case of obviousness has not been established. Withdrawal of this rejection is respectfully requested.

Regarding claim 8, the Office Action acknowledges that Lim et al. '240 fails to disclose a maximum benefit router. See Office Action at page 3, line 12. However, as discussed above, Robinson et al. '411 also fails to disclose, teach or suggest the claimed maximum benefit router. Sill further, as discussed above, simply attaching the router of Robinson et al.'411 to the back end of Lim et al. '240 is a result of improper hindsight and blueprinting, and accordingly a prima facie case of obviousness has not been established. Withdrawal of this rejection is respectfully requested.

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Regarding claim 11, the Office Action acknowledges that Lim et al. '240 fails to disclose a maximum benefit router. See Office Action at page 3, line 12. However, as discussed above, Robinson et al. '411 also fails to disclose, teach or suggest the claimed maximum benefit router. Sill further, as discussed above, simply attaching the router of Robinson et al.'411 to the back end of Lim et al. '240 is a result of improper hindsight and blueprinting, and accordingly a prima facie case of obviousness has not been established. Withdrawal of this rejection is respectfully requested.

Still further, claims 2-3, 5-6, 8 and 11, being dependent upon claim 1, are also allowable for the reasons above. Moreover, these claims are further distinguished by the materials recited therein, particularly within the claimed combination. Withdrawal of the §103(a) rejection is therefore respectfully solicited.

2. Claims 4, 7 and 15

Claims 4, 7 and 15 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,477,240 to Lim et al. in view of U.S. Patent No. 6,141,411 to Robinson et al., and further in view of U.S. Patent No. 6,269,153 to Carpenter et al. Applicant respectfully traverses this rejection.

Carpenter et al. '153 discloses methods and apparatus for call routing whereby a caller' s response to a routing question is used to direct the call to a destination, and storing and processing caller contributions to each call. If the caller's respons e does not allow for unambiguous routing, the routing system poses clarifying questions to the caller, and these additional responses are used to refine the query for use in a subsequent attempt to route the call. The primary objective of Carpenter et al. '153 is to eliminate ambiguity of the caller' s routing request in order for the routing module to be able to route the call appropriately.

As the Examiner has withdrawn the previous rejections using Carpenter et al. '153, it is de facto acknowledgment by the Patent Office that Carpenter et al. '153 does not disclose, teach or suggest a maximum benefit router. Accordingly, Carpenter et al. '153 does not make up for the deficiencies of Lim et al. '420 and Robinson et al. '411, and a prima facie case of obviousness has not been established by the examiner. Withdrawal of this rejection is respectfully requested.

Still further, claims 4 and 7, being dependent upon claim 1, and claim 15, being dependent upon claim 14, are also allowable for the reasons above. Moreover, these claims

are further distinguished by the materials recited therein, particularly within the claimed combination. Withdrawal of the §103(a) rejection is therefore respectfully solicited.

3. Claims 9 and 10

Claims 9 and 10 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,477,240 to Lim et al. in view of U.S. Patent No. 6,141,411 to Robinson et al., and further in view of U.S. Patent No. 5,794,192 to Zhao. Applicant respectfully traverses this rejection.

Zhao '192 discloses an apparatus and method for improving speech recognition. Zhao '192 does not disclose, teach or suggest a maximum benefit router.

The Office Action at page 7, lines 3-5 alleges that Zhao '192 teaches that "the maximum benefit router optimizes ..." This is clearly incorrect. The Office Action reference to Zhao '192 is ONLY to a discussion of Bayesian estimation, which is all that Zhao '192 can be used for, as Zhao '192 does not disclose, teach or suggest a maximum benefit router. Accordingly, Zhao '192 does not make up for the deficiencies of Lim et al. '240 and Robinson et al. '411, and a prima facie case of obviousness has not been established by the examiner. Withdrawal of this rejection is respectfully requested.

Still further, claims 9 and 10, being dependent upon claim 1, are allowable for the reasons above. Moreover, these claims are further distinguished by the materials recited therein, particularly within the claimed combination. Withdrawal of the §103(a) rejection is therefore respectfully solicited.

4. Claim 16

Claim 16 is rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,477,240 to Lim et al. in view of U.S. Patent No. 6,233,555 to Parthasarathy et al. Applicant respectfully traverses this rejection.

Claim 16 recites a method for automatically routing a telephone call using maximum benefit routing, comprising the steps of: receiving a telephone call from a caller; determining phrases from speech utterances by a caller; inputting said determined phrases to a speech recognizer device; converting said recognized determined phrases into at least one of word stems and word classes; performing keyword lookup on the one of word stems and word classes; generating a feature vector that contains the number of times the at least one word

stems and word classes were found in the determined phrase; performing analysis on the feature vector; outputting a posterior possibilities vector; inputting the posterior possibilities vector and determining the expected benefit of routing the call to each of a predetermined destination; and outputting a benefit sorted vector of destinations, benefits and topic scores.

Parthasarathy et al.'555 discloses, and is applied, for disclosing a speaker identification method and apparatus for determining the identification of a speaker based on utterances and threshold scoring. Parthasarathy et al.'555 does not disclose, teach or suggest maximum benefit routing. The Office Action alleges that Parthasarathy et al.'555 teaches generating a feature vector that contains the number of times the at least one word stems and word classes were found in the determined phrase; performing analysis on the feature vector; outputting a posterior possibilities vector; inputting the posterior possibilities vector and determining the expected benefit of routing the call to each of a predetermined destination; and outputting a benefit sorted vector of destinations, benefits and topic scores. However, the examiner has erroneously applied disparate portions of the reference. For example, the Office Action alleges that column 6, lines 52-58 teach inputting the posterior possibilities vector and determining the expected benefit of routing the call to each of a predetermined destination. However, this is taken out of context of Parthasarathy et al.'555, which is describing the steps used to in the training phase of the speaker identification process and shown in Fig. 11. There is no indication that the step 1150, in which "the mixture discriminant analysis unit 620 receives the posterior probabilities and mixture models and performs a mixture discriminant analysis" (column 6, lines 52-55), is determining the claimed expected benefit of routing the call to each of a predetermined destination as recited in claim 16. Still further, the Office Action refers to column 6, lines 3-12 to allege that Parthasarathy et al.'555 teaches outputting a benefit sorted vector of destinations, benefits and topic scores. However, column 6, lines 3-12 disclose a confirmation and rejection process along with a threshold scoring unit 910. "The threshold scoring unit 910 assigns a speaker label $k_i = j$ to each vector x_i, such that the frame-level likelihood score of the feature vector using the model for the speaker j is the maximum of all the speaker frame-level likelihood scores. Column 6, lines 8-12. Accordingly, Parthasarathy et al.'555 teaches assigning utterances to individual speakers, and does not disclose, teach or suggest outputting a benefit sorted vector of destination, benefits or topic scores when routing a call using maximum benefit routing.

Still further, as stated in the preamble of claim 16, the method is for automatically routing a telephone call using maximum benefit routing. As no maximum benefit routing of

telephone calls is disclosed, taught or suggested in Parthasarathy et al.'555, Part hasarathy et al.'555 does not make up for the deficiencies of Lim et al. '240, and a prima facie case of obviousness has not been established by the examiner. Withdrawal of the §103(a) rejection is therefore respectfully solicited.

5.   Claims 12 and 13

Claims 12 and 13 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,477,240 to Lim et al. in view of U.S. Patent No. 6,141,411 to Robinson et al., and further in view of U.S. Patent No. 6,295,533 to Cohen. Applicant respectfully traverses this rejection.

Cohen '533 discloses a system and method for accessing heterogeneous databases. The system is used to answer queries concerning information stored in the database. Cohen '533 does not disclose, teach or suggest maximum benefit routing as recited in the claims, rather, this reference is applied solely for disclosing a Porter stemming algorithm. Cohen '533 does not make up for the deficiencies of Lim et al. '240 and Robinson et al. '411, for all of the reasons discussed above, and a prima facie case of obviousness has not been established.

Still further, claims 12 and 13, being dependent upon claim 1, is also allowable for the reasons above. Moreover, this claim is further distinguished by the materials recited therein, particularly within the claimed combination. Withdrawal of the §103(a) rejection is therefore respectfully solicited.

6.   Claim 17

Claim 17 is rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,477,240 to Lim et al. in view of in view of U.S. Patent No. 6,233,555 to Parthasarathy et al., and further in view of U.S. Patent No. 5,625,748 to McDonough et al. Applicant respectfully traverses this rejection.

McDonough et al. '748 discloses a topic discriminator having an integrated speech recognizer or word or phrase spotter as part of a speech event detector, along with a topic identifier. McDonough et al. '748 does not disclose, teach or suggest maximum benefit routing as recited in the claims, rather, this reference is applied solely for speech analysis. McDonough et al. '748 does not make up for the deficiencies of Lim et al. '240 and Parthasarathy et al.'555, and a prima facie case of obviousness has not been established.

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Still further, claim 17, being dependent upon claim 16, is also allowable for the reasons above. Moreover, this claim is further distinguished by the materials recited therein, particularly within the claimed combination. Withdrawal of the §103(a) rejection is therefore respectfully solicited.

7.   Claim 18

Claim 18 is rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,477,240 to Lim et al in view of U.S. Patent No. 6,233,555 to Parthasarathy et al., and in view of U.S. Patent No. 5,625,748 to McDonough et al., and further in view of U.S. Patent No. 6,269,153 to Carpenter et al.   Applicant respectfully traverses this rejection.

As discussed above, the Examiner has withdrawn the previous rejections using Carpenter et al. '153, and it is de facto acknowledgment by the Patent Office that Carpenter et al. '153 does not disclose, teach or suggest a maximum benefit router. Accordingly, Carpenter et al. '153 does not make up for the deficiencies of Lim et al. '240 and Parthasarathy et al.'555 and McDonough et al. '748, and a prima facie case of obviousness has not been established by the examiner. Withdrawal of this rejection is respectfully requested.

Still further, claim 18, being dependent upon claim 16, is also allowable for the reasons above. Moreover, this claim is further distinguished by the materials recited therein, particularly within the claimed combination. Withdrawal of the §103(a) rejection is therefore respectfully solicited.

8.   Claim 20

Claim 20 is rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,477,240 to Lim et al in view of U.S. Patent No. 6,233,555 to Parthasarathy et al., and further in view of U.S. Patent No. 6,269,153 to Carpenter et al.   Applicant respectfully traverses this rejection.

As discussed above, the Examiner has withdrawn the previous rejections using Carpenter et al. '153, and it is de facto acknowledgment by the Patent Office that Carpenter et al. '153 does not disclose, teach or suggest a maximum benefit router. Accordingly, Carpenter et al. '153 does not make up for the deficiencies of Lim et al. '240 and Parthasarathy et al.'555, and a prima facie case of obviousness has not been established by the examiner. Withdrawal of this rejection is respectfully requested.

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Still further, claim 20, being dependent upon claim 16, is also allowable for the reasons above. Moreover, this claim is further distinguished by the materials recited therein, particularly within the claimed combination. Withdrawal of the §103(a) rejection is therefore respectfully solicited.

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C.   Conclusion

All rejections having been addressed, it is respectfully submitted that the present application is in condition for allowance, and a Notice to that effect is earnestly solicited.

It is believed that any additional fees due with respect to this paper have already been identified. However, if any additional fees are required in connection with the filing of this paper, permission is given to charge account number 07-2347.

Respectfully submitted,

Dated: February 5, 2004   By_____
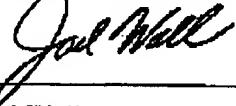
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